



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

Applicant: Indiana Certified Organic, Inc.
Program : National Organic Program 2003 Annual Update - Corrective Action Review
Location(s): 8364 S SR 39, Clayton, IN 46118
Audit Date(s): September 1, 2004
Audit File Number: NP3310GA
Action Required: Yes
Auditor(s): Vickie Robertson
Contact & Title: Cissy Bowman, President and CEO
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AUDIT ACTIVITIES

On September 1, 2004 a representative of the Audit Review and Compliance (ARC) Branch conducted a review of corrective actions submitted by Indiana Certified Organic, Inc. (ICO), Clayton, IN in response to the non-compliances identified in the Annual Update Review Report NP3310GA dated November 6 – December 31, 2003, and included in the materials provided for the 2004 annual update. The review found that the materials submitted were adequate to resolve two of the non-compliances identified in the Annual Update Review. Continuous improvement point NP3310GA.NC1 will remain outstanding pending further information from ICO. The information submitted included:

- Personnel evaluations for the staff and contracted inspectors and reviewers
- A complete client list that included all crops produced and listed wild crop producers
- Documentation of training opportunities available to ICO staff.

FINDINGS

Non-compliance inadequately addressed:

NP3310GA.NC1- CIP – Not Adequately Addressed - 205.504(a)(4) – Requires entities seeking accreditation as a certifying agent to submit “A description of any training the applicant has provided or intends to provide to personnel to ensure that they comply with and implement the requirements if the Act and the regulations in this part”. *Training was identified as a weakness in the annual review. However, the training to be required or provided by ICO was not addressed.* **Corrective Action Submitted:** Documentation was provided for training opportunities that are made available to the staff of ICO. However documentation of which staff members attended the events was not provided. The documentation provided indicated the training was not free, and the cost would be born by the staff members attending.

Non-compliances adequately addressed:

NP3310GA.NC2 - CIP – Cleared - 205.510(a)(4) – Requires the applicant to provide the results of the most recent performance evaluations. *Annual performance evaluations were not submitted for review.* **Corrective Action Submitted:** Annual performance evaluations were provided.

NP3310GA.NC3 - CIP – Cleared - 205.504(d)(1) – Requires an applicant who currently certifies production or handling operations to submit a list of all production and handling operations currently

certified by the applicant. *ICO did not identify any wild crop clients on their list of certified clients, although Roseland Farms was certified for wild crops. Also the list does not include the type of products certified.* **Corrective Action Submitted:** A complete client list with crops certified including the wild crops was submitted via email and with the annual update information for 2004.

RECOMMENDATIONS

Based on the corrective action review the auditor recommends continued accreditation of Indiana Certified Organic, Clayton, IN with normal surveillance activities by appropriate members of the United States Department of Agriculture.